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May 13, 2015

SUBMITTED ELECTRONICALLY VIA FORM 99

Ms. Maureen Benitz

Sr. Campaign Finance & Reviewing Analyst

Reports Analysis Division

RE:Mid-Atlantic Laborers? Political League Response to Request for Additional Information, Filer ID No. C00429175

Dear Ms. Benitz:

I write on behalf of the Mid-Atlantic Laborers? Political League (?LPL?) to respond to your Request for Additional Information dated April 8, 2015 regarding the July Quarterly Report. In your letter, you request clarifying information for a refund of a contribution to the Democratic Party of Virginia that was reported on Schedule A, Line 16 of the July Quarterly Report. You noted that an original contribution to the Democratic Party of Virginia was never reported. The PAC has thoroughly reviewed the circumstances surrounding this refund and has taken corrective action to remedy this error and to ensure that no further refund checks like the one at issue are accepted in the future.

The Laborers? International Union of North America Mid-Atlantic Region (?Region?) operates two political action committees, with the LPL being its federal PAC. The Mid-Atlantic Laborers? Political Education Fund (?Education Fund?) is the Region?s state PAC and is registered solely in the Commonwealth of Virginia. In July 2013, the Education Fund made a contribution in the amount of \$5,000 to the Democratic Party of Virginia, which should have been deposited into the Party?s state account. In May 2014, the Party learned that the Education Fund?s contribution had been inappropriately deposited into its federal account, which prompted the Party to issue a refund check in the amount of \$5,000. However, the Party incorrectly issued the refund to the LPL, when it should have gone to the Education Fund, and the refund was placed in the LPL account.

To correct this problem, the LPL has taken several steps. First, the LPL contacted the Democratic Party of Virginia to notify it of this error. Second, the LPL has issued a refund check to the Democratic Party of Virginia in the amount of \$5,000. The FEC will see this refund check reported on the LPL?s mid-year report due July 31, 2015. (The Democratic Party of Virginia is also issuing a \$5,000 refund check to the Education Fund for the contribution the Education Fund made in July 2013.) With regards to future practice, the LPL has alerted its staff of this inappropriate refund it accepted in May 2014 and has informed staff that going forward, they must always report the original check number of contributions made when accepting refunds of those contributions. This will ensure that potential errors like the one at issue will be caught before any refund checks are accepted and deposited.

On behalf of the Mid-Atlantic Laborers? Political League, I thank you for your assistance in recognizing the refund at issue. Should you have any questions regarding the PAC?s corrective actions, please do not hesitate to contact me directly.

Very truly yours,

John A. Durkalski

Counsel to the MALPL
